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11 *Attorneys for Plaintiff, U.S. Bank National Association, as Trustee, Successor in Interest to Bank  
12 of America, National Association as Successor by Merger to LaSalle Bank National Association,  
13 as Trustee for Certificateholders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed  
14 Certificates, Series 2005-HE6*

15 **UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA**

17 U.S. BANK NATIONAL ASSOCIATION,  
18 AS TRUSTEE, SUCCESSOR IN INTEREST  
19 TO BANK OF AMERICA, NATIONAL  
20 ASSOCIATION AS SUCCESSOR BY  
21 MERGER TO LASALLE BANK  
22 NATIONAL ASSOCIATION AS TRUSTEE  
23 FOR CERTIFICATEHOLDERS OF BEAR  
24 STEARNS ASSET BACKED SECURITIES I  
25 LLC, ASSET-BACKED CERTIFICATES,  
26 SERIES 2005-HE6,

27 Case No.: 2:20-cv-01955-KJD-VCF

28 **STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
FIDELITY'S MOTION FOR  
SUMMARY JUDGMENT [ECF No. 72]**

(First Request)

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC.; FIDELITY NATIONAL TITLE  
INSURANCE COMPANY; DOE  
INDIVIDUALS I through X; and ROE  
CORPORATIONS XI through XX, inclusive,

Defendants.

Plaintiff, U.S. Bank National Association, as Trustee, Successor in Interest to Bank of America, National Association as Successor by Merger to LaSalle Bank National Association, as Trustee for Certificateholders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed Certificates, Series 2005-HE6 ("U.S. Bank") and Defendant Fidelity National Title Insurance

1 Company ("Fidelity"), by and through their counsel of record, hereby stipulate and agree as  
2 follows:

3     1. On September 25, 2023, Fidelity filed a Motion for Summary Judgment [ECF No. 72]  
4         ("Motion");  
5     2. U.S. Bank's deadline to respond to Fidelity's Motion is currently October 16, 2023;  
6     3. On October 12, 2023, the Nevada Supreme Court issued its opinion in *Deutsche Bank*  
7         *National Trust Company v. Fidelity National Title Insurance Company*, Case No. 84161,  
8         139 Nev. Ad. Op. 45 (Oct. 12, 2023) ("Deutsche Bank Opinion"). The *Deutsche Bank*  
9         Opinion addresses the arguments in this matter; however, U.S. Bank need additional time  
10         to analyze the *Deutsche Bank* Opinion and determine next steps;  
11     4. U.S. Bank's counsel is therefore requesting a thirty-day extension until Wednesday,  
12         November 15, 2023, to file its response to the pending Motion;  
13     5. Counsel for Fidelity does not oppose the requested extension;  
14     6. This is the first request for an extension which is made in good faith and not for purposes  
15         of delay.

16             **IT IS SO STIPULATED.**

17             DATED this 16<sup>th</sup> day of October, 2023.

18             DATED this 16<sup>th</sup> day of October, 2023.

19             WRIGHT, FINLAY & ZAK, LLP

19             SINCLAIR BRAUN LLP

20             /s/ Lindsay D. Dragon  
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31             Attorneys for Defendants

32             **IT IS SO ORDERED.**

33             Dated: 10/17/2023



34             \_\_\_\_\_  
35             UNITED STATES DISTRICT COURT JUDGE